



Oregon

Kate Brown, Governor

Department of Environmental Quality

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Dwight Leisle, Environmental Project Manager
Port of Portland
P.O. Box 3529
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Re: DEQ Review "Source Control Evaluation and Source Control Alternatives Evaluation Operable Unit 5 Swan Island Upland Facility"

ECSI No. 271

Dear Mr. Leisle:

The Department of Environmental Quality (DEQ) reviewed the February 13, 2015 *Source Control Evaluation and Source Control Alternatives Evaluation Operable Unit 5 Swan Island Upland Facility* (SCAE OU5), prepared for the Port of Portland by Apex Companies. Thank you for this submittal and the subsequent meetings regarding the SCAE for this portion of the site. DEQ appreciates the Port's continued efforts in addressing source control at the site.

The report presents an updated Source Control Evaluation (SCE) and Source Control Alternatives Evaluation (SCAE) based on additional soil sampling, and comments from DEQ and comments from EPA on early versions these documents.

The report concludes that a source control measure is needed to prevent erosion of soil into the river at concentrations that could result in sediment concentration above remediation goals following cleanup of the Portland Harbor. Copper, lead, cPAHs, and Total PCBs were identified as constituents of concern (COCs) in riverbank soil.

The report recommends the source control measure include re-grading of the erosion areas followed by surface stabilization using re-vegetation above the flood elevation and riprap armoring below the flood elevation. The report recommends that the action be implemented at erosion scarps L and M as soon as practicable, and that the remedial action at remaining scarps I, J and N be implemented in conjunction with the in-water remedy for Swan Island. To verify that this remedy is protective until implementation of the in-water remedy, the riverbank should be monitored after significant flood events but not less that every other year for evidence of erosion at existing scarps or new erosion elsewhere.

Following conversations between DEQ and the Port, the Port modified its recommendation and recommend that the action be implemented for all scarps in front of the Daimler Leasehold (i.e. scarps N, M, L and the 150 feet upriver portion of J).

DEQ concurs with this recommendation and will draft a proposed source control decision to EPA summarizing our proposed plan.

Comments

1. Table 12. Note EPA recently issued Draft Final Portland Harbor PRGs on June 5, 2015. The recommend source control measure is compatible with the revised PRGs which are similar to those used by the Port.
2. 7.0 Recommended Source Control Measure. The recommended source control measure includes monitoring until implementation of the in-water remedy for Swan Island. The need for monitoring after implementation of the Swan Island in-water remedy will need to be evaluated at that time as part of the final pre-remedy inspection.

If you have any questions or concerns regarding these comments please feel free to contact me at (503) 229-5354.

Sincerely,

A handwritten signature in cursive script, appearing to read "David Lacey".

David Lacey
Project Manager
Portland Harbor Section

cc: Herb Clough, Apex Companies
Eva DeMaria, EPA
Matt McClincy, DEQ
File

